

REMARKS

This Amendment is being filed in response to the Office Action mailed on April 13, 2009, which has been reviewed and carefully considered. Reconsideration and allowance of the present application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-5 and 8-17 remain in this application, where claims 6-7 and 18 had been previously canceled without prejudice. Claims 1 and 15 are independent.

In the Office Action, the Examiner objected to claim 16 for a certain informality. In response, claim 16 has been amended in accordance with the Examiner's suggestion. It is respectfully submitted that the objection to claim 16 has been overcome and withdrawal of this objection is respectfully requested.

In the Office Action, claims 1-5 and 8-17 are rejected under 35 U.S.C. §102(b) over U.S. Patent No. 6,091,689 (Taniguchi). Applicant respectfully traverses and submits that claims 1-5 and 8-17 are patentable over Taniguchi for at least the following reasons.

Taniguchi is directed to an optical pickup device that can

read data from and write data to different kinds of optical discs in different formats. On page 6, line 3 of the Office Action, circuitry 112 shown in FIG 13 is referred to as a signal processing circuit. Assuming, arguendo, that the circuitry 112 shown in FIG 13 is a signal processing circuit, FIG 13 and the corresponding description of column 8, lines 36-54 clearly show that outputs of laser couplers LC1 to LCn are provided to "a selector 108 to switch between the laser couplers LC1 to LCn as necessary." (Taniguchi, column 8, lines 38-39; emphasis added) That is, the outputs are not directly the laser couplers LC1 to LCn. Rather, one of the outputs of the laser couplers LC1 to LCn is selected by the selector 108.

In stark contrast, the present invention as recited in independent claim 1, and similarly recited in independent claim 15, amongst other patentable elements recites (illustrative emphasis provided):

wherein at least one current output of a first optical detector unit is connected directly to a corresponding current output of a second optical detector unit at an output node, said output node being directly connected to a processing terminal of the signal processing circuit so that the processing terminal is directly connected to both the at least

one current output of the first optical detector unit and the corresponding current output of the second optical detector unit.

Outputs of detector units that are directly connected to each other at an output node, which is directly connected to a processing terminal, so that the processing terminal is directly connected to both outputs of the detector units, are nowhere disclosed or suggested in Taniguchi. Rather, at best, Taniguchi discloses that the output of each laser couplers LC1 to LCn is provided to the circuitry 112, where one of these outputs is selected by the selector 108. That is the circuitry 112 has multiple inputs to receive multiple outputs of the laser couplers LC1 to LCn.

Further, any photodiodes PD1, PD2 in Taniguchi, even if integrated on a common substrate, still do not have their outputs directly connected to each other at an output node which is directly connected to a processing terminal.


Accordingly, it is respectfully requested that independent claims 1 and 15 be allowed. In addition, it is respectfully submitted that claims 2-5, 8-14 and 16-17 should also be allowed at least based on their dependence from independent claims 1 and 15 as

well as their individually patentable elements.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

By   
Dicran Halajian, Reg. 39,703  
Attorney for Applicant(s)  
July 13, 2009

**THORNE & HALAJIAN, LLP**  
Applied Technology Center  
111 West Main Street  
Bay Shore, NY 11706  
Tel: (631) 665-5139  
Fax: (631) 665-5101